

CORRES. CONTROL  
INCOMING LTR NO.

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DATE

ACTION

DIST.	LTR	ENC
ALLEN, R.C.		
BENSUSSEN, S.J.		
BRENNAN, P.D.		
BUHL, T.R.		
CARD, R.G.		
DEAN, C.		
EVANS, B.L.		
FERRERA, D.W.		
GEIS, J.A.		
GILLISON, W.R.		
GLOVER, W.S.		
HARROUN, W.P.		
HEDAHL, T.G.		
HERRING, C.L.	X	
HILL, J.A.		
KELL, R.E.		
KELLY, G.M.		
MANI, V.		
MARTINEZ, L.A.		
McANALLY, J.L.		
McGOVERN, L.J.		
McKIBBIN, J.G.		
MEADOWS, S.M.		
NORTH, K.		
OGG, R.N.		
SANDLIN, N.B.		
SHUMWAY, W.K.		
SPEARS, M.S.		
STEELMAN, M.		
TUOR, N.R.		
TURNER, K.A.		
VOORHEIS, G.M.		
Steban, A.	X	
Tyson, A.	X	
PHILLIPS, F.	X	
Bull, J.E.	X	
Blain, S.	X	

CORRES. CONTROL	X	X
ADMN RECORD/080		
PATS/T130G		

Reviewed for Addressee  
Corres. Control RFP

7/10/96  
DATE BY

Ref Ltr. #

DOE ORDER # 5400.1



Department of Energy

ROCKY FLATS OFFICE  
P.O. BOX 928  
GOLDEN, COLORADO 80402-0928

JUL 10 1996

Mr. Carl Spreng  
Mr. Harlan Ainscough  
Colorado Department of Public Health and Environment  
4300 East Cherry Creek Drive South  
Denver, Colorado 80222-1530

Mr. William Frazer  
U.S. Environmental Protection Agency  
999 18th Street, Suite 500  
Denver, Colorado 80202-2466

Gentlemen:

On June 20, 1996, the U.S. Environmental Protection Agency (EPA) and the Colorado Department of Public Health and Environment (CDPHE) provided the U.S. Department of Energy, Rocky Flats Field Office (RFFO) a list of outstanding concerns on the RCRA Facility Investigation/Remedial Investigation (RFI/RI) Reports for Operable Units (OU's) 5 & 6. This correspondence responds to those concerns, reflecting the discussions held at the aforementioned meeting.

Specific concerns raised by CDPHE and EPA, and our responses, follow.

- 1) The adjustment factor used in the OU's 5 & 6 risk assessments for gastrointestinal (GI) absorption was 0.5 and a factor of 1 is preferred. The same is true for OU's 2, 7 and possibly others. Recalculations using a factor of 1 will be performed for OU's 5 & 6, and for other OUs that used the "matrix effect," as funds become available. We are hopeful that funds for OU's 5 and 6 will become available this fiscal year, but do not anticipate that funding for other OU's will become available before FY 1997. Please bear in mind that our risk assessors do not agree that the assumption of a 1.0 GI absorption rate is valid; therefore, RFFO does not at this time concur with CDPHE's views on this subject. Nonetheless, we will provide the results of these calculations as requested, and we believe that they will not change the overall conclusions reached in the RI/RFI reports.
- 2) If land use assumptions change, the human health risk assessments in the RI/RFI reports are no longer valid. A statement to the effect of "if land use assumptions change from those assumed in the RFI/RI Report, the Record of Decision (ROD) will be revisited," will be included in the Proposed Plans and RODs for both OUs 5 & 6.
- 3) The seeps from OUs 5 & 6 should be adequately addressed. The Site is dealing with seeps through the next revision to the Final Groundwater Conceptual Plan for the Rocky Flats Environmental Technology Site (Site). Improvement of water quality in these seeps is a goal of groundwater plume management. There are several ways in which this is being addressed at the Site. The first is through source removal, according

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to the environmental restoration prioritization system. This occurred in Ryan's Pit, is presently occurring in trench T-3 and will occur in trench T-4. Ex-situ remediation of seeps is being considered, where water would be collected at the springs and run through a cheap and simple gravity flow fixture with reactive iron, or another material. The Site is seeking funding to move forward with this technology on a demonstration basis. Bear in mind also that the Action Level Framework demands that investigation and possible mitigation be performed if contamination from the seeps affects water quality in the ponds such that surface water quality standards are violated. While RFFO does not consider that the seeps are part of the Record of Decision for OU's 5 and 6, we recognize that management of the seeps does play a role in assuring the long-term water quality of the ponds in these OU's, and are planning and implementing remedial actions accordingly.

4) The groundwater plume between the Industrial Area and OU7 should be adequately addressed. The Groundwater Conceptual Plan for the Site (RF/ER-95-0121.UN), has a groundwater plume section. Tier I and Tier II wells are planned for construction to monitor the plume, and treatment or other management will depend upon results of characterization from these wells.

5) There is a concern about infiltration from the OU 7 pond into OU 6. According to the IM/IRA document, the only potentially problematic contaminants from the pond have been manganese, zinc and tyrene, and only once have chromium and lead levels measured above the ARARs. Regardless, groundwater modeling software, MODFLOW (for groundwater) and PATH 3D (for particles in groundwater), showed it would take 30 years for the particulates to move 50 feet, and other data show the drainage route leading to OU 6 waters is a mile long. The model also showed that the leachate will not cause any standards exceeds at the point of compliance. Risk assessment calculations showed the leachate poses no risk to an open space user and falls within the 10E-4 to 10E-6 range for a residential user, a scenario more conservative than the one employed in the OU 6 RI/RFI report. Once the landfill is capped (approx. 2000-2008), there should be a 60% decrease in leachate generated as well. Therefore, it is highly unlikely the OU 7 pond will adversely affect OU 6 waters.

6) The Ecological Risk Assessment recalculation with new radionuclide levels should be performed. By July 31, Professor Kathy Higgly of the Univ. of Washington-Corvallis will incorporate all comments on radionuclide benchmarks and we will share the results of her work with you.

7) Off-Site receptors should be adequately addressed. The Site has prepared a Pond Operations Plan that addresses the present and future management of the ponds. In it, the water levels in the ponds are planned to be maintained for a number of years, and so limit any pathway from wind-borne pond sediments. In addition the ROD will be reevaluated every five years, as required by law. If assumptions have changed, action can be taken to reflect the ponds' status at that time (see response to item 2, above). Also, as required by law, the Agency for Toxic Substances and Disease Registry (ATSDR) will be performing a health assessment of effects caused by activities on the Rocky Flats Site as a whole. We are working with ATSDR to include pond sediment in their scope of study.

8) Several responses to both EPA and CDPHE comments were to be incorporated into the final RFI/RI, yet they were not. These changes will be incorporated into the RFI/RI addendum.

9) B1 dam hot spot removal has not occurred. Attached to this letter is the draft Proposed Action Memorandum for your review. RFFO is working with our contractor and the FY '97 budget to incorporate the work into planning for FY '97, although at this time funding for this effort in FY97 cannot be assured. Please note that since the hot spot is not an IHSS it will not be addressed in the OU 6 Proposed Plan.

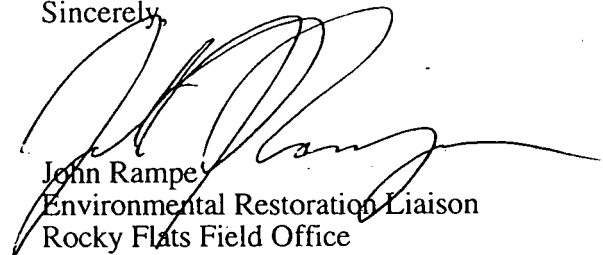
10) The OU 6 RFI/RI Report is unclear if there is a pre-existing or post-existing layer of asphalt and gravel in the Soil Dump Area. On June 24, 1996, Dave George and Karlynn Cory of RFFO investigated the IHSS (156.2) in question. Their conclusion was that there are several chunks of asphalt (the largest 8"x8", on average about 2"x3") and a few piles of gravel (the largest 3' x 5') scattered in the Soil Dump Area, but that the majority of it is a large soil pile. Dave George's assumption is that the material was from the area excavated for the double fence around the Protected Area.

11) IHSS 165 (the Triangle Area) would be best left in the Industrial Area. RFFO has no objection to excluding IHSS 165 from the OU 6 ROD. It is our understanding that the final Rocky Flats Cleanup Agreement will be revised to reflect this.

RFFO hopes that this adequately addresses your concerns to date. While we recognize that other concerns may arise later, we ask that you complete your review of the RFI/RI reports for OU 5 and 6 as soon as possible, to support expeditious Records of Decision for these areas. We look forward to working with you on the Proposed Plans and the Records of Decision for OUs 5 and 6, and request that you forward comments on the OU 5 and 6 Proposed Plans at your earliest convenience.

Please call me at 966-6246 with any questions or comments.

Sincerely,



John Rampe  
Environmental Restoration Liaison  
Rocky Flats Field Office

Enclosure

cc (w/o Enclosure):

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